

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JERRY T. JONES, )  
                        )  
Plaintiff,         )  
                        )  
v.                   ) Cause No. 07 C 7117  
                        ) Judge Suzanne B. Conlon  
AMERICAN AIRLINES, INC., ) Magistrate Judge Martin C. Ashman  
                        )  
                        )  
Defendant.         )

**DEFENDANT'S UNOPPOSED MOTION FOR AN EXTENSION  
OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant American Airlines, Inc. ("American"), by and through its attorneys, hereby moves this Court for an extension of time within which to answer or otherwise plead in response to Plaintiff's Complaint. American requests an additional fourteen (14) days to prepare its response. In support of this motion, American states as follows:

1. On December 19, 2007, Plaintiff Jerry T. Jones ("Plaintiff") filed a Complaint with this Court against American. On December 26, 2007, the Complaint was served on American's registered agent.

2. On January 15, 2008, the Court entered an order setting February 14, 2008 as the deadline by which American must answer or otherwise plead.

3. On January 30, 2008, the parties appeared and informed the Court that they were in settlement negotiations. The Court set a status for the parties to report on settlement for February 28, 2008.

4. The parties are in settlement discussions and are working to finalize the details at this time. As such, the parties agree that American should not expend the resources to

file an Answer to the Complaint at this time, and Plaintiff seeks an extension until February 28, 2008 to answer or otherwise plead, in anticipation that the matter may be fully settled by that time.

5. On Thursday, February 7, 2008, counsel for American spoke with counsel for Plaintiff, who stated that he did not oppose this motion.

6. American is acting in good faith by requesting this extension and does not believe that it will unduly delay this litigation. Further, the parties will not be prejudiced if such an extension is granted.

WHEREFORE, for the foregoing reasons, American respectfully requests that this Court enter an order granting it leave to answer or otherwise respond to Plaintiff's Complaint on or before February 28, 2008.

Dated: February 8, 2008

Respectfully submitted,

AMERICAN AIRLINES, INC.

By: \_\_\_\_\_/s/ Tiana F. Nell  
One of Its Attorneys

Cheryl Tama Oblander  
Tiana F. Nell  
Winston & Strawn LLP  
35 West Wacker Drive  
Chicago, Illinois 60601  
Tel: (312) 558-5600  
Fax: (312) 558-5700  
[ctama@winston.com](mailto:ctama@winston.com)  
[tnell@winston.com](mailto:tnell@winston.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of February, 2008, I caused a copy of the foregoing to be served on counsel for Plaintiff through the Court's electronic filing system:

Jeffrey L. Taren  
Kinoy, Taren & Geraghty P.C.  
224 S. Michigan Ave. #300  
Chicago, IL 60604

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/s/ Tiana F. Nell